

EXHIBIT 12

**UNREDACTED
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TO BE SEALED**

Cory Buland

From: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>
Sent: Tuesday, October 24, 2017 2:02 PM
To: Cory Buland
Cc: QE-Waymo; Uber-sg@LISTS.SUSMANGODFREY.COM;
BSF_EXTERNAL_UberWaymoLit@bsflp.com; UberWaymoMoFoAttorneys
Subject: RE: Waymo v. Uber - Waymo Litigation Hold
Attachments: -Waymo- 20170707 PROD017 Waymo Privilege Log.pdf

Cory,

Happy to help. Please see entries 5 and 6 on the attached privilege log.

Thanks,
Jeff

From: Cory Buland [<mailto:CBuland@susmangodfrey.com>]
Sent: Monday, October 23, 2017 6:18 PM
To: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>
Cc: QE-Waymo <gewaymo@quinnemanuel.com>; Uber-sg@LISTS.SUSMANGODFREY.COM;
BSF_EXTERNAL_UberWaymoLit@bsflp.com; UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>
Subject: Waymo v. Uber - Waymo Litigation Hold

Counsel,

In response to Uber's RFP No. 158, Waymo agreed to "produce or log documents sufficient to identify the first date that Waymo instituted a litigation hold" and repeated that undertaking to the Court in Dkt. 746 at 8 (attached). Would you please identify the privilege log entry or produced document, by bates number(s), to which you were referring?

Thank you,

Cory Buland
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#	Bates Number	Document Date	Custodian (Location)	Email From/Author/Custodian	Recipients	Privilege Description	Privilege Assertion	Redacted	Steps Taken to Ensure Confidentiality	Received by Unauthorized Persons?
					[REDACTED]					
6	03/02/2017	Dmitri Dolgov, Kristinn Gudjonsson, Pierre-yves Droz, John Krafcik, Tim Willis, Gary Brown, Larry Page, Stacy Savides Sullivan	Raquel Small-Weikert*	[REDACTED]	[REDACTED]	Email containing and reflecting legal advice of counsel re legal dispute prepared in connection with litigation.	Attorney Work Product, Attorney Client Communication	NO	Document maintained in Waymo's internal, confidential custodial document repositories	To the best of Waymo's knowledge, this document has not been received by unauthorized persons

#	Bates Number	Document Date	Custodian (Location)	Email From/Author/Custodian	Recipients	Privilege Description	Privilege Assertion	Redacted	Steps Taken to Ensure Confidentiality	Received by Unauthorized Persons?
					[REDACTED]					
7	WAYMO-UBER-00024588	03/07/2017	Dmitri Dolgov	Nathaniel Fairfield ([REDACTED])	Amar Mehta* ([REDACTED]); Andrew Chatham ([REDACTED]); Dmitri Dolgov ([REDACTED]); Kevin Vosen* ([REDACTED]); Matthieu Devin ([REDACTED])	Email seeking and reflecting legal advice of counsel re employment issues.	Attorney Client Communication	YES	Document maintained in Waymo's internal, confidential custodial document repositories	To the best of Waymo's knowledge, this document has not been received by unauthorized persons
8	WAYMO-UBER-00024730	03/16/2017	John Krafcik	Kevin Vosen* ([REDACTED])	John Krafcik ([REDACTED])	Email containing legal advice of counsel re legal dispute prepared in connection with litigation.	Attorney Work Product, Attorney Client Communication	YES	Document maintained in Waymo's internal, confidential custodial document repositories	To the best of Waymo's knowledge, this document has not been received by unauthorized persons